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OBJECTIVE

This Manual assigns institutional responsibilities and establishes mandatory duties and specific procedures for Employees, Managers and Shareholders, covering relations with any stakeholder group. Its purpose is to raise awareness on the importance and need to prevent and avoid the materialization of risks related to Corruption and/or Bribery, and consequently of their legal and disciplinary consequences, both for the corporation and for individuals, that could result from such behavior.

Specifically, the objectives of this Manual are the following:

Promote a culture of legality, ethics, and transparency within GEB aimed at the prevention and management of events, acts and risks related to Corruption and/or Bribery, highlighting the value of integrity as the guiding principle for all internal relations and relations with stakeholders, as well as reiterating the commitment of all the employees to always act in an ethical and loyal manner.

Establish mechanisms to detect, investigate, monitor, remedy, report and penalize in an effective and timely manner any events of Corruption and/or Bribery at GEB.

Manage the risks of Corruption and/or Bribery through a process of identification, assessment, and detection of such risks, and through the adequate implementation of the controls necessary for their prevention or mitigation.

Establish roles, duties, and responsibilities for compliance with this Manual.

Inform and instruct all GEB Stakeholders on the risks of Corruption and Bribery, including their corresponding adverse consequences and emphasizing that it is forbidden to incur in any behaviors

related to Corruption and Bribery while engaging with Public Officials and in negotiations with legal entities, both public and private.

Set the model for collaborating with the relevant authorities investigating behaviors of Corruption and Bribery, including Transnational Bribery.

Comply with applicable regulations, good practices and international standards related to the prevention and control of Corruption and/or Bribery.

Determine the regime of penalties to be imposed in the event of any breach, violation and/or failure to observe the provisions of this Manual, GEB's Code of Ethics and Conduct, and other rules, policies and procedures regarding the prevention and management of Corruption and Bribery.

Document the elements of the Corporate Transparency and Ethics, Anti-bribery, and Anti-corruption Program.

SCOPE

This manual is a regulatory and consultation document that requires mandatory compliance by GEB Employees, Managers and Shareholders while performing their roles and exercising rights within the company

Similarly, the Suppliers, Contractors, Intermediary Third Parties, Clients and any individual or legal entity that has a business, legal or employment relationship with GEB must comply with the provisions of this Manual whenever, by virtue of contract or agreement, they must abide by its provisions, in the terms set out in the Code of Ethics and Conduct and in the Code of Ethics and Conduct for Suppliers and Contractors of GEB, as well as the defined contractual clauses incorporated in the documents.

Regarding the non-controlled companies in which GEB has equity interest, employees representing it on the Boards of Directors or equivalent corporate bodies shall disclose, present, and propose the best practices of anti-corruption and anti-bribery corporate ethics, so that these may be assessed and considered for adoption by the relevant bodies.

DESCRIPTION OF THE MANUAL

1. INTRODUCTION

In line with its Corporate Governance provisions, and in order to fully achieve its higher purpose of “improving lives with sustainable and competitive energy,” GEB is firmly committed to an ethical culture based on zero tolerance for acts of Corruption and Bribery, which are scourges that threaten the country's economic and social development. To this end, GEB complies with applicable national

and international laws regarding this matter, as well as with standards and conventions that allow adopting the best business practices in the fight against these crimes.

GEB promotes a culture against Corruption and Bribery by defining and implementing guidelines and procedures aimed at preventing, detecting, and addressing these crimes in performance of its operations and in all its legal and business relationships. The Employees, Managers, Shareholders, Counterparties, business partners, and in general all stakeholders of GEB must promote a culture of ethics, transparency, and legality, based on integrity and from the perspective that Corruption and Bribery are unacceptable practices that run against the corporate values of GEB and of all the companies that form part of the Business Group.

In view of the above, all actions, decisions, and internal and external relations of GEB and its subsidiaries must follow the guidelines established in this Manual, in the Code of Ethics and Conduct of GEB and other internal rules, policies and procedures.

This Manual is part of the GEB corporate documents aimed at achieving the continuous implementation of international standards, such as the ten universally accepted principles of the United Nations Global Compact, especially the principle 10 related to the fight against Corruption in all its forms (including Bribery) that seeks to foster and strengthen measures for preventing and managing its occurrence.

The above is taking into consideration that any GEB employee, regardless of his/her duties, or hierarchical level, and/or status or non-status as registered agent, manager, or agent, can comprise GEB as a legal entity due to his/her actions and omissions related to Corruption and/or Bribery.

2. CONTEXT OF THE ORGANIZATION

This Manual intends to drive the development of coordinated actions to identify, detect, prevent, manage, mitigate and fight against the risks of Corruption and Bribery; promote transparency in management of the activities of GEB and its subsidiaries; prohibit any conducts associated with Corruption and Bribery, and promote the commitment of GEB and its Employees, Managers, Shareholders, related parties and stakeholders in general against Corruption and Bribery, in coordination with the Risk Policy and the Comprehensive Risk Management Process.

Risks are assessed and managed in accordance with the procedures on the identification and assessment of the risks of Corruption and Bribery, in proportion to the materiality, size, structure, nature, country of operation and specific activities of GEB. It therefore takes into consideration the particularities of a company of the size and scope of GEB, focusing all the guidelines contained in this manual, and in general in the Corporate Transparency and Ethics Program, on ensuring that the specific conditions and features of GEB are incorporated in the management and mitigation of the risks. Such specific conditions include:

- The international nature of GEB's operation
- The provision of public utility services

- Constant interaction with authorities and public officials, both local, national, and foreign
- The need to obtain authorizations, licenses, state permits to initiate or maintain operations
- The constant interaction with communities in the company's areas of influence.
- The participation in markets for different energy sources
- The provision of multiple services (transportation, distribution, generation)
- The corporate structure of the business group, as the parent company of subsidiaries and affiliates, and as a shareholder in non-controlled companies.

3. STAGES OF PREVENTION AND MANAGEMENT OF CORRUPTION AND BRIBERY RISKS

The process of identification, analysis, assessment, control, monitoring and updating the risks of Corruption and Bribery is performed in accordance with guidelines established in GEB's risk management policy and the corporate risk management procedures, as well as the compliance risk matrix and monitoring of strategic risk controls related to breaches of the ethical framework of GEB or its subsidiaries.

In any case, the prevention and management of corruption and bribery risks is performed in the following stages:

3.1. Identification of Risks

The process of identifying corruption and bribery risks takes into consideration GEB's specific characteristics and particular conditions, as well as the counterparties and business partners in the geographic areas where it operates.

GEB will carry out the following activities to identify Corruption and Bribery risks:

1. Identify and assess risks through independent diagnoses, such as periodic Due Diligence and compliance evaluation procedures, which must be carried out with operational, technological, economic, and human resources that are necessary and sufficient to achieve the objective of a proper assessment.
2. Adopt appropriate measures to mitigate the risks of Corruption and Bribery once they have been identified and detected.
3. Identify risk factors such as country, economic sector and third-party risks, among others.
4. Assess and update the risks of Corruption and Bribery whenever GEB ventures into new markets or introduces new products or services.

3.2. Assessment and evaluation of Riskss

Once the risks of bribery and corruption are identified, the impact and likelihood of occurrence will be analyzed, both inherently (before implementing controls) and residually (after applying controls). Risks are measured and assessed in detail in a risk and controls matrix.

The assessment of risks aims to identify, document, manage, and mitigate Corruption and Bribery Risks through the controls designed by GEB for the different processes and projects, also assigning those responsible for executing such controls and the evidence that must be provided.

3.3. Control of Corruption and Bribery Risks

After defining the inherent risk profile, those controls that allow the proper management of corruption and/or bribery risks, whether preventive, detective, or corrective, must be identified. The implemented controls aim to reduce the impact and/or the frequency of their materialization.

Within the framework of the methodology and procedure for corporate risk management, the definition of risk controls (including corruption and bribery) is determined by the process leader / risk leader or their equivalent. Controls of the risk correspond to the measures that maintain and/or modify a risk; these include but are not limited to any process, policy, devices, practices, and other conditions and/or actions that maintain and/or modify a risk, which take place throughout the Organization, at all levels and in all functions and may also include a series of diverse activities such as approvals, authorizations, verifications, reconciliations, reviews of operational performance, asset security, among others.

3.4. Monitor and Update

The Compliance Officer is responsible for monitoring the effective, efficient, and timely operation and compliance with this Manual, as well as the effectiveness of the measures adopted by GEB to prevent and manage Corruption and Bribery Risks.

The Compliance Officer, the Ethics and Compliance Committee and the Audit and Risk Committee of Board of Directors shall promote any required amendments and updates to the corruption and bribery risk matrix, as long as they are necessary based on the reality of the business, the circumstances of the operation, the acquisition of new assets that change or expand the risks that were initially included, in order to ensure the adequate management of such risks.

This Manual must be continuously updated as soon as circumstances require it and, in any case, every two years when modifications are not urgent in nature.

Updates must be performed according to the provisions set forth in GEB's internal procedures, especially regarding management and compliance of the Ethics and Compliance Program¹ and control mechanisms monitoring.²

The following are reasons for updating this Manual and the corruption and bribery risk matrix, among others:

- I. Changes in rules and regulations, both domestic and foreign, that are applicable to GEB.

¹ CUM-PRO-018 Ethics and Compliance Program Management

² CUM-PRO-040 Compliance Program Monitoring Mechanisms

- II. New recommendations on Corruption and Bribery prevention and management issued by the Superintendence of Companies and/or any other competent authority, particularly the Superintendence of Residential Public Utilities, which is GEB's supervisory body.
- III. Recommendations made by the Corporate Compliance Department and/or the Audit and Risk Committee of the Board of Directors.
- IV. Provision of new services.
- V. Performance of GEB's activities in new geographic areas.
- VI. Changes in the corporate strategy at GEB.
- VII. The acquisition of new companies or assets that expand or change the scope or nature of GEB's operations.

The Compliance Officer must keep a record of the changes and updates made to this Manual once they are approved by the corresponding corporate body. This record must include, at a minimum, a summary of the changes or updates made, the reasons for the changes, and the dates on which they were made.

4. INTERNAL GUIDELINES

GEB prohibits any practice related to Corruption and Bribery, including Facilitation Payments. In this regard, Employees, Managers and Shareholders are forbidden from offering, granting, authorizing, promising, accepting and/or requesting any improper advantage of any value, be it in cash or in kind, either directly or indirectly, from/to any third parties, including Suppliers, Contractors and Public Officials, both domestic and foreign.

4.1. Corruption

Corruption involves the abuse of positions of power or trust, for personal gain at the expense of the collective interest, carried out through offering or requesting, delivering, or receiving money or goods in kind, services, or benefits, in exchange for actions, decisions or omissions, according to Transparency for Colombia

Types of corruption

There are two types of corruption depending on who receives the gains from the corruption act. These include:

- **Private Corruption:** It occurs as a result of a commercial or contractual relationship between private parties, and the benefit does not go beyond the private sphere.
- **Public Corruption:** It arises in a relationship between individuals and public officials, or among officials of public entities, and/or when the public official is the one receiving the benefit.

4.2. Bribery

Bribery is an offer, promise, delivery, acceptance, or request of an improper advantage of anything of value (which may be financial or non-financial in nature), directly or indirectly, and regardless of the location thereof, in violation of applicable law, as an inducement or reward for a person to act or refrain from acting in connection with the performance of that person's duties.³

Bribery can take place through different means, and it is always necessary to review the conditions and specific context to determine if it entails a situation seeking an undue advantage, an illicit or punishable end. A bribe can be configured through an offer, payment, promise, or request. Among the modalities frequently used for the configuration of bribes, the following (among others) are highlighted, clarifying that for the effective configuration of a bribe, an undue advantage must be intended or effectively obtained, and the following behaviors are merely outlined for informational purposes, since bribes tend to materialize through such mechanisms:

- Money, deeds, or securities
- Gifts
- Political contributions in cash or in kind
- Donation to charities or non-profit organizations, in cash or in kind
- Payments or reimbursements of travel expenses
- Job offers
- Commissions and/or discounts
- Payment of public or private services
- Payment in full or in part or condoning of debts
- In-kind services (painting, electricity, consulting, among others)
- Scholarships
- Entertainment (meals, tickets to events and shows, among others)
- Improvements to assets or properties owned by a GEB employee or his/her family members
- Payment of personal and/or professional services to the benefit of a GEB employee or his/her family members (appraisals, legal, accounting, and financial consulting, among others).

GEB acknowledges that there are situations where it is culturally acceptable to give or receive gifts or gratuities to/from a client, supplier, or stakeholder. However, this practice must be strictly governed by the guidelines provided in the internal regulations for the Management of Gifts and Gratuities.

4.3. Transnational Bribery

Transnational bribery implies an offer, promise, or payment of money or benefits of any kind to a foreign public official.⁴

3 ISO37001 3.1. Definition of Bribery

⁴https://www.cancilleria.gov.co/sites/default/files/FOTOS2020/guia_practica_entender_lucha_soborno_transnacional.pdf

Transnational Bribery is one of the modalities of bribery. In this type of bribery, the passive subject, i.e., the party who receives the bribe, is a foreign public official. The purpose is this type of bribery is usually to obtain government contracts in foreign jurisdictions, to issue or obtain advantages for the company from the bribed public official, by having that official perform, omit, delay, or take any other action related to the official's duties in connection with an international business deal or transaction.

4.4. Contracting and Knowledge of Counterparties and Business Partners

Based on the analysis of Corruption and Bribery Risks, GEB establishes controls aimed at preventing and managing any behaviors related to Corruption and/or Bribery within the framework of relations with Counterparties and business partners.

To this end, the area responsible for the engagement and/or maintenance of the labor, legal, commercial, and/or business relationship with the corresponding counterparty and/or business partner (GEB's first line of defense) carries out and/or requests a Due Diligence and/or Expanded Due Diligence, as the case may be, in order to properly understand the respective Counterparty and/or business partner, and identify any relevant alerts at an early stage. The results of the information obtained will be evaluated by the Corporate Compliance Department, the area responsible for assessing risks and issuing applicable recommendations in each case.

Specifically in regard to Employees, Managers, Suppliers, Contractors and Communities, the following internal processes, or any other that may replace them, shall apply.

- Employees and Managers: the Human Resources Department is in charge of executing the internal process of "human resources management." This process may involve performing interviews, technical assessments of required competencies, psychotechnical assessments and security background checks.
- Suppliers and Contractors: the Sourcing and Services Department is in charge of executing the internal process of "sourcing."
- Communities: the Social Department is in charge of executing the internal processes associated with community relations, including, without limitation, the following, or any others that may replace or amend them:
 - I. Social investment – identification of units and project planning according to the procedure **DIP-PRO-067 Social Investment Identification of Territorial Units and Project Planning**
 - II. Social investment – Structuring of the project according to the procedure **DIP-PRO-068 Social Investment Structuring of the Contracting Process**
 - III. Social management planning according to the procedure **DIP-PRO-069 Social Planning Management.**
 - IV. Inter-cultural relations planning according to the procedure **DIP-PRO-070 Inter-cultural Relations Planning**
 - V. And the provisions of the Manual **DSO-MAN-003 Inter-cultural Relations Guidelines**

The above is taking into consideration that as part of the business and sustainability culture, GEB offers ongoing support to its stakeholder communities, promoting programs and projects aimed at generating sustainable progress for the communities.

If a transaction with a counterparty and/or business partner involves an investment in capital, a merger or acquisition (M&A) operation, the acquisition of an asset, or a share interest in another company, the applicable Due Diligence procedures must be completed. In any case, the verification must be carried out in lists. Regarding extended due diligence, these will proceed if applicable according to internal guidelines, in accordance with the following section of this Manual.

4.4.1. General Guidelines for Sanctions List Checks and Due Diligence performed by GEB's First Line of Management

As part of GEB's internal controls to be followed to get to know Employees, Managers, Suppliers and Contractors, as well as in cases of relations with communities in which GEB resources are involved, the corresponding area of GEB's first line of management shall carry out the following, without exception:

- Request for validation in Sanctions Lists by the Corporate Compliance Department, pursuant to the provisions of the internal procedure **CUM-PRO-002 Verification in Sanctions Lists**
- Perform the following procedures in connection with the respective Counterparties, most of which are described in the aforementioned procedure:
 - I. Request from the Counterparty a statement of the origin and destination of funds.
 - II. Request a statement of PEP from the Counterparty, taking into account the provisions of the applicable regulations on the matter.
 - III. Request the Counterparty to provide information on its Final Beneficiary, whenever its shareholders include one or more legal entities.
 - IV. Request the Counterparty information on its ownership and control structure, whenever the shareholders or its parent company, branches or subsidiaries include one or more legal entities.
 - V. Request from the Counterparty a statement accepting compliance with GEB's internal rules, policies and procedures regarding the prevention and management of Corruption and Bribery, as well as with domestic and foreign laws on the matter.
- Carry out an Extended Due Diligence when alerts are identified regarding the Corruption and Bribery risks of the counterparties and/or business partners with whom GEB has or intends to have a legal business or contract, in order to examine the transactions and/or activities carried out and ensure that these are consistent with the knowledge of the

counterpart and/or business partner, their shareholdings, their business activity, and the origin and/or destination of the funds.

- Validate the information and documentation provided by the respective Counterparty and/or business partner at the request of GEB within the Due Diligence framework requested by the corresponding first-line management area of GEB.

Each area of the first line of management of GEB must document the Due Diligence processes, as appropriate, requested as part of the controls implemented. Likewise, the information obtained during Due Diligence updates must be preserved according to the rules set out in this Manual.

4.4.2. Criteria for the performance of Expanded Due Diligence by the Corporate Compliance Department

Aside from the request for checks in sanctions and control lists by the respective areas of GEB's first line of management, in certain cases, in accordance with the provisions of Procedure CUM-PRO-028 DUE DILIGENCE, a request must be made for the performance of an Extended Due Diligence to the Corporate Compliance Department.

In addition to the criteria defined in the procedure, if any employee considers that a review and/or additional inquiries to the consultation in sanctions lists is required, the Extended Due Diligence procedure may be requested from the Corporate Compliance Department.

When the Counterparty and/or business partner is a legal entity, Compliance Due Diligence involves knowing their respective shareholders or partners with a share interest or shareholding equal to or greater than 5% of the share capital, its board members, legal representatives, managers, and final beneficiaries.

The Compliance Due Diligence is carried out according to what is established in the internal procedure **CUM-PRO-028 Due Diligence**.

4.5. Relations with Public Officials

GEB maintains relations with various public officials based on legality, cooperation, and transparency. Employees and Managers who due to the nature of their responsibilities must have some sort of relations with Public Officials, domestic or foreign, must act professionally, abiding by current applicable laws and strictly complying with the provisions of this Manual and other GEB internal rules, policies and procedures regarding prevention and management of Corruption and Bribery.

In order to comply with the provisions of the Foreign Corrupt Practices Act (FCPA), GEB has established that any type of payment to officials or government entities, whether direct or through partners, contractors, intermediaries, represents a red flag.

Considering the above, GEB prohibits without exception:

- For Employees and Managers to incur in actions related to Corruption and Bribery, in the framework of relations with Public Officials.
- To make any Facilitation Payment, grant economic benefits to groups outside the law in exchange for the safety of operations.
- Make payments for lobbying expenses and lobbying through intermediaries and/or any third party on behalf of GEB, as well as any act of corruption or bribery or any activity that may affect the Group's reputation
- Influence peddling. Employees and Managers are forbidden from using their influence, involvement, economic or political power, real or fictitious, over any Public Official, with the purpose of obtaining for themselves or for GEB any benefit or business advantage, or to cause harm to a person or to the Public Official, regardless of the outcome or of whether the Public Official accepts it or not.
- Submitting false, incomplete, or altered documentation or information, or simulating compliance with requirements or rules established in administrative procedures with the purpose of obtaining an authorization, license, permit, or business advantage for GEB.
- To act or make a decision in the face of a real or potential conflict of interest.

In addition to the above, before interacting with a Public Official, Employees and Managers must:

- Ensure compliance with Colombian and foreign laws (when applicable) regarding the prevention and management of Corruption and Bribery. If in doubt, you should contact and consult the Corporate Compliance Department through the Ethics Channel.
- Ensure compliance with the provisions of this Manual, as well as GEB's Code of Ethics and Conduct and other rules, policies and procedures regarding prevention and management of Corruption and Bribery risks.
- Inform the immediate supervisor about the need to interact with a Public Official in the performance of their duties and receive the corresponding authorization, following the documentation procedures established by GEB to this effect.

In some cases, it might be difficult to determine whether or not certain individuals are Public Officials. If in doubt in this regard, ask the Compliance Officer through the Ethical Channel. In any case, while waiting for a response to the inquiry, it must be assumed for all effects that the person on whom the inquiry was made is a Public Official, and action must be taken accordingly.

4.6. Gifts and Gratuities

Corruption and Bribery are not limited to money nor to the effective delivery of goods or services. Therefore, Employees and Managers are prohibited from offering, granting, authorizing, promising, accepting, requesting, and/or receiving gifts and/or gratuities, including gifts, entertainment, invitations, benefits, trips, courtesies, among others, to Public Officials and to employees, managers, or shareholders of legal entities with which GEB has any type of relationship or link, as well as to any family member of these, in order to influence any decision that could directly or indirectly benefit GEB. This prohibition extends to all relationships aimed at establishing a direct or indirect commercial

or contractual relationship and obtaining a benefit for a third party, provided that the Company's employee and/or manager's link is used as a means for this purpose.

The only exception to the above is in the case of promotional items designed to position the image and as brand reminders, which must be reasonable to that end (including, but not limited to, pens, appointment books, calendars, umbrellas), and the value of which must be less than the amount established in the procedure **CUM-PRO-035 Gifts and Gratuities Management**.

Employees and Managers may attend events and/or celebrations sponsored by Suppliers and/or Contractors, for which they must always have prior approval by GEB's Corporate Compliance Department and their immediate supervisor, and as long as any required expenses and travel allowances are paid by GEB in accordance with the applicable policy. If it concerns the Company's President, only the corresponding management before the Corporate Compliance Department is required.

To this effect, Employees and Managers must follow the guidelines set forth in GEB's Corporate Policy on Gifts and Gratuities, and in case of any doubt, must submit an inquiry through GEB's Ethical Channel.

4.7. Donations, Sponsorships, and Political Contributions

As a general rule, donations are prohibited in GEB and are only made in the framework of social and shared value programs, and/or in the case of natural disasters or humanitarian emergencies, relief may be granted, in accordance with the monetary limits provided for in accordance with the statutory powers of the President of the Company. If the relief exceeds such limits, prior approval of the Board of Directors must be obtained. In any case, it must be documented and accounted for in accordance with the applicable internal rules.

Sponsorships can only aim to support the positioning of GEB brands and must be endorsed by the communications area, upon receipt of the request by the interested area with the justification of the need to sponsor or be present at an event, in accordance with the corporate strategy.

Contributions to political parties or movements, in cash and/or in kind, on behalf and representing GEB, are prohibited. Therefore, Employees, Managers and Shareholders may not grant to any political party or movement, either domestic or foreign, and/or any PEP, contributions on behalf and/or in representation of GEB. Furthermore, they are not allowed to utilize their personal funds or those of a third party to make contributions to a political party or movement on behalf of GEB.

Employees, Managers, and Shareholders may only participate in political activities on a personal basis, and as long as such participation cannot be misconstrued as in any way related to participation by GEB; and such activities do not interfere with the business, regular work hours and/or their internal functions at GEB. Likewise, they must refrain from carrying out any type of political proselytism at GEB's facilities.

GEB must permanently monitor the final use of the funds allocated to social investment and/or sponsorships to ensure that they are not used as a mechanism for bribes or to commit acts of corruption, or that they are used without reasonable justification and the corresponding supporting documents. The fact that any undue payments or benefits are made through a third party does not in any way exempt GEB from its responsibility.

Verification and monitoring of compliance with the ban on political contributions is governed by GEB's internal procedure **CUM-PRO-020 Monitoring Mechanisms – Financing of Political Parties**

4.8. Handling Money in Cash

As a general rule, no payments can be made or received in cash or cash equivalents at GEB. Employees and Managers who, in performing their functions, must handle money in cash must use it solely and exclusively for the operational matters that require it, or for any contingencies, within the limits of the law. In any case, the internal provisions regarding the use of cash issued by the Financial Vice-president's Office must be fully observed.

GEB's Financial Vice President has the authority to create petty cash funds and establish the requirements that must be taken into account to appoint the individuals responsible, both principal and substitute, for the respective petty cash fund. These responsible individuals must be Employees appointed through internal communications. All funds from the petty cash funds must be used for their assigned purposes and in abidance of the provisions on opening, managing, reimbursing and legalizing the costs, as well as in abidance of the provisions on payments and operation of the petty cash funds, in accordance with the procedures adopted by GEB to this effect, as well as the provisions of Public Notice No. 027 of October 28, 2021, or its equivalent document.

4.9. Contractual Procedures

Employees and Managers must always comply with the laws, rules, and regulations, both domestic and foreign, applicable to contractual procedures.

Therefore, it is forbidden for Employees and Managers to engage in the activities listed below, which is not an exhaustive list:

- Disclosing non-public or confidential information related to contractual processes to third parties.
- Manipulating the contractual and/or selection terms of Suppliers or Contractors or interfere in their selection in order to steer the business towards a particular bidder or third party, grant any advantage that affects the equality of conditions or free competition, by deviating from the standard process.
- Selecting Suppliers or Contractors that do not meet the characteristics established in the terms of the corresponding selection process.
- Awarding contracts to Suppliers or Contractors in exchange for obtaining any private benefit.
- Defining or approve contractual requirements that do not fully meet the requirements, or that are not at market prices or based on reasonable offers, without clear and satisfactory justification.

- Assisting in contracting processes or contractual relationships, make payments of remuneration outside the defined contractual scope without the corresponding amendments or authorizations; or enter into contracts outside the reasonable market values in order to conceal undue payments or for an illicit purpose.

On the other hand, GEB only performs and executes contracts awarded through transparent processes and performed within the framework of ethics and the law, and according to the provisions of the Contracting and Performance Control Manual. Information on competitor companies or individuals in bidding and awarding processes shall only be obtained and used exclusively through legitimate means and purposes, as allowed by law, and in a manner compatible with loyalty and respect as required by GEB's good business practices.

4.10. Internal Accounting

GEB handles its accounting in a secure, reliable, and systematic manner, through an Internal Control system that ensures the detailed and accurate handling of transactions and assets. Likewise, GEB stores all supporting documents of accounting records in a secure and systematic manner.

Therefore, Employees whose duties include executing transactions must abide by the internal procedures established by GEB to this end, and document such actions in appropriate records. Also, any accounting or financial information that is or must be reported, either internally or externally, shall fulfill the criteria of exactness and accuracy.

Taking the above into account, it is forbidden for Employees and Managers to engage in the following, the list not being exhaustive:

- Altering or manipulating income and/or expense accounts to reflect a performance that does not correspond to reality, disregarding the applicable procedures or without the necessary authorizations for such purpose.
- Altering the order or date of transactions in the records.
- Leaving spaces that allow for insertions or additions to the text.
- Making interlinear entries, strikeouts, amendments, blotting and/or corrections in the books.
- Removing pages, altering the order of the pages and/or altering electronic files.
- Making accounting entries in periods that exceed the established deadlines in the applicable regulations or internal provisions with the purpose of reflecting a financial position that does not correspond to reality.
- Inappropriately valuing GEB's assets to reflect a financial position that does not correspond to reality.

- Disclosing inaccurate, incomplete, or misleading information in the financial statements that could lead to misguided decisions by potential investors, lenders, or any other user of the financial statements.
- Performing or omitting adjustments in accounting records for personal benefit or to benefit a third party.
- Deliberately concealing or failing to report any accounting errors.
- Taking money or assets from GEB disregarding internal procedures or without the required authorizations and/or in an improper manner.
- Siphoning funds from a GEB account for personal benefit or to benefit a third party.
- Using petty cash funds without fully complying with the applicable procedures and without the necessary supporting documentation for the legalizations, when required.
- Forgeries or alterations to any type of document or record.
- Using false documents to support accounting.
- Having a double set of books.
- Making unauthorized double payments or incurring in expenses not supported with formal documentation.
- Manipulating treasury surpluses for one's own benefit or that of a third party.
- Handling or using GEB's information assets for personal benefit or to benefit a third party.
- Diverting company resources for personal benefit or with the purpose of committing an act of Corruption and/or Bribery.
- Selling, offering, disclosing, or using GEB's commercial and business secrets, including proprietary or confidential information, or other intellectual property, in breach of applicable regulatory provisions.

4.11. Entertainment, Travel, Food, Lodging and Invitations for Employees and Stakeholders

GEB has clear predefined procedures for the recognition of expenses incurred in any trips made by employees that are required to fulfill their duties. The guidelines are duly defined in the Procedure *ISA-PRO-005 Management of Employee and Stakeholder Travel*.

It clearly defines the expenses that can never be recognized by GEB, which include alcoholic beverages, personal expenses other than the essential travel, food and lodging expenses not

supplied by the hotel or the event, changes in itineraries due to personal interests, higher class tickets that have not been previously authorized by the immediate supervisor, toiletries, gifts or any item for personal use that is not directly related to the purpose of the trip or required to fulfill the employee's duties. No refund may be requested for tips or any kind of attention, and the provisions established in the applicable procedure must be followed.

GEB's expense recognition guidelines establish that only trips that must be made in connection with performing the duties related to the nature of the position will be recognized, and that no expenses will be recognized for entertainment or activities that are not essential for performing work-related duties.

Regarding Stakeholders , this item covers GEB shareholders and investors, opinion formers (representatives of mass media and alternative media of interest to GEB), public officials from public entities or bodies associated with GEB's management, as long as the activities are aimed at fulfilling the Company's objectives, members of communities, members of public or private business associations of the electricity sector, Board members and lecturers, panel members and guest speakers for GEB events.

It is clarified that no travel expenses are allowed for stakeholders that have any incompatibility or disqualification or that have conflicts of interest, as defined in the Corporate Governance Code of GEB S.A. ESP, the Code of Ethics and Conduct of GEB S.A. ESP, and applicable regulations for GEB. The stakeholders do not qualify for any travel expense reimbursements, except Board members who have the right to payment of professional fees, according to the procedure **ACO-PRO-003 Administration of the Board of Directors and its Committees**, based on amounts of reference that apply to the payment of travel expenses at GEB.

According to said procedures, all travel must be made in the framework of austerity, defined as the capacity of manage funds in a fair and simple manner without luxuries or extras.

For all effects, it shall be understood that all approved trips and expenses must be directly related to the interests of GEB, with the assigned duties, and not for entertainment, improper, unethical, illegal, personal, family or any other purpose not directly related to the Company's objectives or that run against the law, the corporate values, or internal policies. For this reason, all prior approvals must have been issued, in accordance with the aforementioned procedure.

4.12. Payments of Benefits, Remuneration and Commissions to Employees and Contractors

4.12.1. Employees

GEB has clearly defined guidelines for the payment of fixed and variable compensation to Company employees, which are defined in the "*GEB Compensation and Benefits Policy*".

The Policy is mainly based on achieving the performance objectives of the Company and its different areas, and the benefits granted to employees are aimed at improving the employees' quality of life and well-being, following the guidelines and premises set out in the Policy. The benefits must be

consistent with the level of responsibility of the positions and the achievement of predefined and approved measurement criteria.

Under no circumstances shall benefits, commissions, and payments to employees be used as incentives for corrupt purposes or to commit acts of bribery. GEB rejects this type of acts and prohibits these behaviors.

4.12.2. Suppliers and Contractors

In all cases, payments to suppliers and contractors must be consistent with the amounts and modalities agreed in the legal instruments, such as duly signed contracts or agreements, subject to fulfillment of the established requirements and conditions. There will be no grounds for payments outside the framework of the contractual relationship, and in all cases the payments must be verified and authorized by the contract supervisor.

Certain contracts include the modality of reimbursable expenses, which are subject to the strict guidelines contained in the “*GEB Contracting and Performance Control Manual*,” as well as the specific conditions contained in the signed contract or agreement. All expense reimbursement requests must include adequate supporting documents, must not exceed the contractually authorized amounts, and be consistent with a previously approved reimbursable expense item. The total amount of reimbursable expenses may not exceed, under any circumstances, the percentages established in accordance with the current Contracting and Execution Control Manual and/or the conditions set forth in each specific contract, nor may tips, any type of commission, gift, or similar item be paid to such effect, seeking to obtain undue advantages in GEB's contractual relationships.

Under no circumstances will payments to contractors be used as incentives for corrupt purposes or committing acts of bribery. GEB rejects this type of acts and prohibits these behaviors.

5. ROLES AND RESPONSIBILITIES

GEB seeks to clearly establish and assign the duties and responsibilities associated with the prevention and management of the risks of Corruption and Bribery. These functions and responsibilities are mandatory rules of conduct that guide GEB's actions, and failure to observe or comply with them gives rise to the application of the penalties' regime provided for in the Internal Work Regulations.

The following are the main functions and responsibilities.

5.1. Board of Directors

Board members must comply with the following specific functions regarding the prevention and management of Corruption and Bribery:

- Approve the Corporate Ethics, Anti-corruption, and Anti-bribery Policy. Promote a culture of ethics, transparency, legality, and compliance within GEB.
- Remain committed to preventing Corruption and Bribery, to ensure that GEB performs its business in an ethical, transparent, and honest manner.
- Ensure the supply of the economic, human, technical, and technological resources required for compliance with the Corporate Ethics, Anti-Corruption, and Anti-Bribery Policy and the provisions of this Manual.
- Define the profile and appoint the Compliance Officer.
- Order to take any appropriate actions against employees with direction and management duties in the Company, and against managers whenever they are in breach of the provisions of this Manual, the PTEE and/or the anti-bribery or anti-corruption management system.
- Receive and review on a semi-annual basis information on the contents and operation of the anti-corruption and anti-bribery management system, as well as the Corporate Transparency and Ethics Program.
- Support the Compliance Officer's leadership in the defined communication and education strategy, as well as ensure the effective dissemination and knowledge of Compliance Policies and the PTEE to employees, associates, counterparties (according to risk factors and risk matrix), business partners, and other identified stakeholders.

5.2. Audit and Risk Committee of the Board of Directors

The following responsibilities are assigned to the Audit and Risk Committee of the Board of Directors:

- Verify the adequate disclosure of information related to events of corruption or bribery, such as fines, penalties, investigations by legal or control entities, among others.
- Recommend to the Board of Directors the guidelines, policies, principles and measures to be applied in connection with the fight against corruption and bribery.
- Review and monitor the management carried out by the Corporate Compliance Department regarding reports of corruption and/or bribery, or any other breach of GEB's ethical framework that could additionally have an impact of the financial statements of GEB, and how they can be mitigated or addressed through actions proposed by the Board of Directors.
- Monitor the adequate application and effectiveness of corruption and bribery risk management system.
- Propose possible improvements, updates or amendments to this Manual and other rules, policies, and procedures on this matter to assure that risk management is consistent with the realities of the business, the operation, and applicable regulations.

5.3. Senior Management

- Demonstrate commitment to this Manual and set an example through their actions, thereby promoting a culture of ethics and zero tolerance for acts of corruption and/or bribery.
- Ensure that the Corporate Ethics, Anti-corruption, and Anti-bribery Policy is established, implemented, maintained, reviewed, and updated, in order to adequately manage the organization's risks of corruption and bribery.
- Ensure the alignment of the Organization's strategy with the Corporate Ethics, Anti-corruption, and Anti-bribery Policy.
- Ensure that the Anti-Corruption and Anti-Bribery Management System and the Transparency and Corporate Ethics Program (PTEE) are designed and implemented properly to achieve their objectives, in accordance with the applicable regulations on the subject.
- Promote an anti-bribery and anti-corruption culture within the Organization and promote corporate ethics.
- Promote the continuous improvement of the Anti-corruption and Anti-bribery management system.
- Support other relevant management roles in their prevention, detection and punishment of both bribery and corruption.
- Promote the use of the ethical channel.
- Take the necessary measures so that no employee suffers reprisals, discrimination, or disciplinary actions as a result of making reports in good faith or based on a reasonable belief related to alleged behaviors associated with corruption and/or bribery, and in general to any illegal or unethical conduct.
- Ensure that duties and responsibilities are assigned to the relevant roles for the management of anti-corruption and anti-bribery, and that they are communicated within and at all the levels of GEB.
- Report a timely manner any alerts on potential cases of corruption and/or bribery to the Corporate Compliance Department through the Ethics Channel.

5.4. Registered Agent

GEB's registered agent must comply with the following specific functions regarding the prevention and management of Corruption and Bribery:

- Provide effective, efficient, and timely support to the Compliance Officer in the design, direction, supervision, and monitoring of the application of this Manual.

- Issue and define the Corporate Ethics, Anti-corruption, and Anti-bribery Policy jointly with the Compliance Officer.
- Remain committed to preventing the risks of Corruption and Bribery, to ensure that GEB performs its business in an ethical, transparent, and honest manner.
- Ensure the allocation of the economic, human, and technological resources required by the Compliance Officer to fulfill his/her duties.
- Attend training sessions given at GEB regarding prevention and management of Corruption and Bribery and ensure that Senior Management establishes guidelines of behavior in connection with the ethical culture, and makes it mandatory to abide by them, as well as attendance to training by all employees.
- Submit to the approval of the Board of Directors, jointly with the Compliance Officer, the Corporate Ethics, Anti-corruption and Anti-bribery Policy and any required amendments thereof.
- Ensure that the Corporate Transparency and Ethics Program is coordinated with the Compliance Policies adopted by the Board of Directors.
- Certify to the Superintendence of Companies compliance with the provisions of this Manual.

5.5. Compliance Officer / Compliance Function

The Compliance Officer has the following specific functions regarding the prevention and management of Corruption and Bribery:

- Oversee the adequate internal compliance at GEB with this Manual and the Corporate Ethics, Anti-corruption and Anti-bribery Policy, and other rules, policies, and procedures on this matter.
- Submit to the approval of the Board of Directors, jointly with the Registered Agent, the Corporate Ethics, Anti-corruption and Anti-bribery Policy and any required amendments thereof.
- Ensure that activities resulting from the execution of this Manual are properly documented, so that the information fulfills the criteria of integrity, reliability, availability, compliance, effectiveness, efficiency, and confidentiality.
- Coordinate and lead a suitable communication and training strategy to ensure effective dissemination and understanding of this Manual and Compliance Policies to the employees and managers.

- Take the lead in the identification and assessment of the risks of corruption and bribery, as well as define controls for their mitigation.
- Implement a Risk Matrix and update it according to the characteristics of GEB, its Risk Factors, the materiality of Corruption and Bribery risks, in accordance with the Corporate Ethics, Anti-Corruption, and Anti-Bribery Policy.
- Monitor compliance with the obligations derived from the Manual and the Corporate Ethics, Anti-bribery, and Anti-corruption Policy.
- Submit a biannual report to the Board members of GEB on the management of Corruption and Bribery risks.
- Establish and ensure additional policies and procedures aimed at the effective prevention of Corruption and Bribery.
- Assure the implementation of appropriate channels to enable anyone to report, in a confidential and safe manner, any potential breach of the PTEE and suspicious activities related to Corruption and/or Bribery.
- Manage the Ethics Channel and guarantee the protection of those who use it to file reports.
- Establish internal investigation procedures at GEB for possible acts of Corruption and/or bribery, as well as for non-compliance with the PTEE.
- Immediately report to the Board of Directors any material violation of the defined provisions on management of the risks of Corruption and Bribery.
- Oversee the proper and effective performance of Extended Due Diligence, in order to mitigate and control corruption and bribery risks in the performance of GEB activities, in accordance with the mechanisms applicable to GEB.
- Assure adequate filing of the supporting documents and other information related to the management and prevention of the risks of Corruption and Bribery.
- Delegate responsibilities to his/her direct reports, such as investigations, forensic analyses, or requests to contract external or third-party providers to address specific needs related to the administration and management of the risks of corruption and bribery.

5.5.1. Minimum Requirements for the Compliance Officer

The Compliance Officer, at a minimum, must fulfill the following formal requirements:

- Know and understand the nature and activities performed by GEB.

- Be capable of making decisions to manage the Risks of Corruption and Bribery and have direct communications with and functionally report to the Board of Directors.
- Possess sufficient certified knowledge on the administration and management of Corruption and Bribery Risks.
- Not belong to GEB's management or corporate bodies, nor act as a statutory auditor or internal or external auditor of GEB.
- Not act in the capacity of Compliance Officer at companies that are GEB competitors, or at more than ten companies, except in the case of a declared conglomerate or business group.
- To reside in Colombia.

Disqualifications and incompatibilities for the Compliance Officer:

The provisions set forth below aim to ensure that the decisions and performance of the Compliance Officer's functions are impartial and objective, in line with his/her powers.

Disqualifications for the Compliance Officer: In addition to those determined by the Board of Directors, the following are considered scenarios that can cause the disqualification of the main or alternate Compliance Officer:

- An exact match is found in the watch lists due to events or situations related to money laundering, terrorist financing, financing the proliferation of weapons of mass destruction, fraud, bribery, corruption, disciplinary, judicial and/or fiscal records, and/or having been suspended or excluded from practicing the profession.
- Having held positions in public entities involving supervision, monitoring, control, or regulation in the organization or sector, during the two years prior to being recruited and appointed as Compliance Officer of GEB.
- Having entered into and/or approved contracts directly or through family members up to the second degree of consanguinity, second degree of affinity and first degree of civil status to perform functions and/or activities of the area.
- Incompatibilities of the Compliance Officer: In addition to those determined by the Board of Directors the following are considered scenarios that can cause incompatibility of the main or alternate Compliance Officer:
 - Profiles that are incompatible due to their function, such as working in commercial activities or control areas, for example, in General Auditing, Statutory Auditing, Internal Control and others. As well as being a member of the Board of Directors.

5.6. Employees and Managers

Employees and Managers of GEB must comply with the following specific duties and obligations in terms of prevention and management of Corruption and Bribery:

- Refrain from engaging in any conducts, practices or acts of Corruption and/or Bribery, an in general in any unethical or illegal activity.
- Refrain from acquiring goods or services for personal use or on behalf of a third party with GEB resources or by misappropriating or using GEB assets for personal benefit or that of a third party, such as goods, equipment, furniture, inventories, among others.
- Know, understand, and comply with the guidelines set forth in this Manual and other internal rules, policies, and procedures on the matter.
- Manage the controls assigned in a structured and strategic manner to prevent and mitigate the risks of Corruption and Bribery and document the compliance activities.
- Foster a culture of ethics within GEB as a key element for the prevention, management and investigation of Corruption and Bribery.
- Act with honesty and integrity at all times, protecting the assets, resources, and information they are responsible for related to the proper functions of their positions within GEB.
- Keep all internal processes properly documented, especially when they imply relations with Suppliers, Contractors, or Public Officials.
- Report through the Ethics Channel any Warning Signs, suspicious activities and/or Corruption and/or Bribery events they become aware of, either directly or indirectly, alleged or actual, including any violation of the provisions contained in this Manual or in the Corporate Ethics, Anti-corruption and Anti-bribery Policy.
- Cooperate with any internal or external investigations or reports related to corruption, bribery, or in general any ethics violations, carried out by the competent authorities, always ensuring the confidentiality, secrecy, and responsible handling of the information to which they have had access for such purposes.
- Follow the procedures of Due Diligence and Due Diligence Corporate Compliance Department, as appropriate, in order to identify, detect, prevent, manage, mitigate, and assess Corruption and Bribery Risks in the development of GEB activities.
- Fully comply with and follow the guidelines established in GEB's Code of Ethics and Conduct, as well as in other internal rules, policies, and procedures.
- Attend training sessions given at GEB regarding prevention and management of Corruption and Bribery.
- Employees who due to their activities or duties are more exposed to the risks of corruption and bribery shall additionally comply with the special obligations of diligence and care in

following the applicable procedures, such as forwarding any information related to interactions or relations with public officials, reporting any reception, request, promise or delivery of any gifts or gratuities, requesting appropriate prior approval for any event or invitation by a Counterparty, and in the event such approval is granted, ensure that GEB covers all the expenses arising from participation in the event.

5.7. Statutory Auditor

GEB's Statutory Auditor must fulfill the following specific duties regarding prevention and management of Corruption and Bribery risks:

- Pay special attention to the Warning Signs detected during performance of his/her duties associated with the risks of Corruption and Bribery.
- Report to the competent authorities any behavior of Corruption and/or Bribery detected during the performance of his/her duties. The corresponding report must be submitted within 6 months from the moment that the respective Corruption and/or Bribery behavior becomes known, for which the principle of professional secrecy shall not apply.
- Evaluate the Corporate Transparency and Ethics Program (PTEE) and issue an opinion on it. Assess GEB's internal compliance with this Manual, as well as with other related rules, policies, and procedures, and issue an opinion on the matter.

5.8. Internal Audit

The Internal Audit area has the following specific functions regarding the prevention and management of Corruption and Bribery:

- Develop an audit plan that includes an assessment of compliance with this Manual and monitoring of the identified controls.
- Offer reasonable assurance to the Audit and Risk Committee of the Board of Directors on the sufficiency of the anti-corruption and anti-bribery controls for the mitigation of the respective risks.
- Assess and implement the techniques and processes deemed most appropriate to periodically verify and evaluate the effectiveness of the procedures to prevent any acts of Corruption and/or Bribery, as well as verify that Compliance Policies are updated when necessary.

6. COMMUNICATION AND TRAINING

Employees, Managers and Shareholders must have proper knowledge of this Manual to prevent any toleration or occurrence of actions or behaviors of Corruption and/or Bribery within GEB. To this end, GEB has mechanisms for the publication, dissemination, socialization and training of this Manual, the

Code of Ethics and Conduct, and the standards, policies and procedures regarding the prevention and management of Corruption and Bribery.

In order to strengthen the process of detection, identification and prevention of the risks covered by this Manual, training will be provided to the following groups:

1. **Board of Directors and Audit and Risk Committee of the Board of Directors:** Development of skills to identify the risks of corruption and bribery among Company Board members.
2. **Employees in Management Position or with Special Duties as Functional Managers and Contract Supervisors:** Development of skills based on practical cases to detect and prevent acts of corruption and bribery in their processes.
3. **Employees in general:** Selective, focused, and ongoing training must be provided depending on the processes identified as risky in terms of corruption and bribery. Additionally, new hire orientation must include training on compliance, including topics on bribery and corruption.
4. **Contractors and Suppliers:** Contractual clauses must be included related to the prevention of corruption and bribery. Additionally, the supplier training programs will include training workshops on the detection and prevention of the risks of corruption and bribery, and on the existing procedures at the Company to report any indications of potential events of corruption and/or bribery.

Training sessions should aim to raise awareness of the threats that Corruption and Bribery represent for GEB, the risks to which Employees, Shareholders, Managers, and related Third Parties are exposed, the administrative and personal responsibilities that may arise from these behaviors, and the criteria for updating when circumstances so require.

Such training must be provided at least once each year and for all new hires, in accordance with requests made by the Human Resources Department. For this, GEB may seek support from external subject matter experts.

Annual training sessions must be duly evaluated, and such evaluations must be documented, indicating at a minimum the date, the topic discussed, and the name and identification of each attendee. If evaluations are not passed, feedback will be provided to reinforce the topics covered.

7. ETHICS CHANNEL

The Ethics Channel allows reporting in a secure, confidential manner any behavior that might constitute an act of Corruption and/or Bribery, as well as violations to this Manual and other rules, policies, and procedures regarding the prevention and management of Corruption and Bribery risks.

Reports must include, at a minimum, the following information:

- A description of the facts.
- The category and type of fact (according to the Report Category Guide list).
- Identification of the presumed responsible parties.

Inquiries or clarification requests regarding situations that are probably or presumably related to Corruption and/or Bribery, or ethical dilemmas in general, must include, at a minimum, the following information:

- A description of the inquiry or clarification request.
- Identification of the requesting party if the report or claim is not made anonymously.

GEB rejects any type of retaliation or reprisal against anyone who uses the Ethics Channel in good faith. The Ethics Channel encourages reporting without fear of possible retaliation or reprisals, and thus, anyone who engages in acts of retaliation against someone who filed a report in good faith, including behaviors associated with workplace harassment, is subject to internal disciplinary sanctions.

At the same time, GEB does not tolerate reports filed in bad faith, and thus, someone who files such a report shall also be subject to the corresponding sanctions.

The Compliance Officer is in charge of managing the Ethics Channel and guaranteeing the protection of those who use it to file reports. Therefore, the Compliance Officer must adopt the corresponding measures to ensure the confidentiality of received reports and to initiate the corresponding investigation.

The channels made available by the Superintendence of Companies and the Secretary of Transparency of the Presidency of the Republic should also be taken into consideration for reporting any alleged or actual event or act of corruption or bribery.

8. COLLABORATING WITH AUTHORITIES

In the event it is determined, based on reasonable supporting evidence, that during the course of GEB's activities acts of Corruption and/or Bribery have been committed, GEB shall inform the competent authorities of the situation, providing any available information, in compliance with legal provisions on the matter.

GEB's Corporate Compliance Department is responsible for defining the events that must be reported to the authorities, which must be duly documented, indicating the reasons for which the corresponding decisions were made.

Likewise, any request for information by competent authorities related to Corruption and/or Bribery must be addressed by the Compliance Officer with the support of the legal area, or the area or unit in charge of the process, or by GEB's registered agent, if the corresponding authority so requires it. Therefore, those Employees who receive requests for information from competent authorities regarding Corruption and Bribery must refer these requests to the Compliance Officer.

The Compliance Officer must ensure the registration and preservation of the documentation and information related to requirements from authorities.

9. WARNING SIGNS

Any Warning Signs detected by Board members, managers, employees, contractors, suppliers, shareholders, and in general by any counterparty and/or business partner, must be duly reported through the Ethics Channel.

Examples of some Warning Signs are listed below:

a) In the analysis of accounting records, transactions, or financial statements:

1. Invoices that are apparently false or that do not reflect the true nature of a transaction or made at excessive prices or that contain excessive discounts or rebates.
2. Foreign transactions with overly sophisticated contractual terms.
3. Transfer of funds to countries considered tax havens.
4. Transactions that do not have a logical, economic, or practical explanation.
5. Transactions that depart from the ordinary course of business.
6. Transactions where the identity of the parties or the origin of the funds is unclear.
7. Assets or rights included in the financial statements that have no real value or do not exist.

b) In the corporate structure or the corporate purpose of companies with which GEB has business or legal relations:

1. Complex or international legal structures with no apparent commercial, legal or tax advantages, or holding and controlling a legal entity with no business purpose, especially if it is based abroad.
2. Legal entities with structures that involve domestic or international trusts, or non-profit foundations.
3. Legal entities with structures involving off-shore entities or off-shore bank accounts.
4. Companies that are not in operation in the terms of Law 1955/2019 or that due to the way they do business may be considered “dummy” companies, i.e., that do not reasonably fulfill any business purpose.
5. Companies declared spurious suppliers by DIAN.
6. Legal entities that do not identify the Final Beneficiary.

c) In the analysis of transactions or contracts:

1. Frequent use of consulting and intermediation contracts and joint ventures.
2. Contracts with contractors or government entities that give the appearance of legality but do not reflect precise contractual duties and obligations.
3. Contracts with contractors that only provide services to one client.
4. Unusual losses or profits in contracts with contractors or government entities or significant changes with no business justification.
5. Contracts that contain unreasonable variable remuneration or that contain payments in cash, in Virtual Assets (as defined in Chapter X), or in-kind.
6. Payments to PEPs or persons closely associated with them.
7. Payments to related parties (associates, employees, subsidiaries, and branches, among others) with no apparent justification.

Additionally, the following indications or situations that generate red flags for corruption and/or bribery:

- Refusal to provide information at the time of registration.
- Refusal to update information upon GEB's request.
- Providing incomplete, difficult to verify or false information.
- Making single or multiple transactions in cash in local or foreign currency.
- Sudden and excessive increases in investments, or purchases of securities, or increases in wealth.
- Making high-amount investments and withdrawals shortly thereafter.
- Suspicious movements or inadequate records in accounts.
- Disappearance or concealment of assets.
- Drastic changes in the lifestyle of Managers or Employees.

These Warning Signs are not a comprehensive list, but only a series of dynamic red flags that may be changed or supplemented based on continuous improvement, corporate practices, findings, and lessons learned from the materialization or management of risks. Consequently, Employees and Managers must use their best judgment in order to maintain transparent relations with Counterparties.

10. MEASURES DUE TO NON-COMPLIANCE AND SANCTIONS REGIME

Any violation and/or failure to observe the provisions of this Manual, the Code of Ethics and Conduct and other rules, policies and procedures regarding prevention and management of Corruption and Bribery shall be considered a serious offense in light of the Internal Work Regulations and will give rise to the most rigorous sanctions provided thereby. The above is without prejudice for any criminal, legal or administrative sanctions that may be imposed by competent authorities pursuant to legal provisions.

11. DOCUMENT MANAGEMENT

GEB has a Document Classification System that enables the identification of the documents produced by each area of GEB by means of Document Retention Tables, in order to ensure the adequate management of the information received, sent or produced by employees during performance of their duties, to thereby prevent and control the risks of Corruption and Bribery, as well as ensure the conservation and preservation of the information that forms part of the Corporate Transparency and Ethics and Anti-bribery and Anti-corruption program.

Consequently, all employees must comply with the provisions of the Document Management Department in the procedures **GDO-PRO-016 Official Communications Management** and **Rights of Petition (PQRS)**, **GDO-PRO-002 Official Communications Dispatch** and **GDO PRO-003**

Organization and Insertion of Documents, for the application of the Document Classification System.

12. APPROVAL

The approval of this Manual, as well as the different amendments and/or updates made thereto, is the responsibility of the Company's President.

The Corporate Compliance Director must submit any amendments and/or updates of this Manual for the respective approval, ensuring that all related information is duly documented in the corresponding minutes.

DEFINITIONS AND ACRONYMS

- 1. Shareholders:** Individuals or companies that have made a contribution in cash or other assets that can be valued in cash to GEB in exchange for shares. (Source: GEB's Code of Ethics and Conduct)
- 2. Managers:** Refers to the registered agent, the liquidator, the factor, the members of boards or councils of directors and those who, in accordance with the bylaws, exercise or hold these functions within GEB. (Source: GEB's Code of Ethics and Conduct)
- 3. Senior Management:** refers as a whole to the Executives, President, Vice Presidents, and Directors of areas. (Source: GEB's Code of Ethics and Conduct).
- 4. Final Beneficiary:** It refers to the individual(s) who ultimately represent, directly or indirectly, the individual on whose behalf a transaction is conducted. It also includes the individuals exercising effective and/or ultimate control, directly or indirectly, over a legal person or other unincorporated structure and/or those established in the Colombian Tax Law and/or the rules that amend or supplement it. (Source: GEB's Code of Ethics and Conduct for Suppliers and Contractors)
- 5. Ethics channel:** Mechanism that allows (i) reporting any illegal or unethical act, misconduct, bad practices, or violations of the GEB ethical framework that occur in the development of the activities of GEB and its Employees, (ii) reporting any non-compliance with GEB's policies, manuals, and internal regulations, and (iii) means by which ethical dilemmas can be consulted and clarifications requested. (Source: GEB's Code of Ethics and Conduct).
- 6. Safeguard clauses:** Clauses that are mandatory to be included in all contracts, agreements and legal documents signed by GEB and whose purpose is the prevention and control of Corruption and Bribery, among other illegal conducts that represent a departure from the ethics framework.
- 7. Employees:** Individuals hired by GEB through an employment or apprenticeship contract who provide services under supervision and in exchange for remuneration. This includes Managers. (Source: GEB's Code of Ethics and Conduct)

- 8. Board of Directors' Audit and Risk Committee:** This committee has the objective of reviewing that Managers comply with the adopted accounting procedures, analyzing the recommendations given by GEB's statutory auditor related to financial statements, and reviewing GEB's control architecture. Likewise, it supervises and assesses GEB's Internal Control system, including risk analysis, to recommend and issue opinions to GEB's Board of Directors, and executes other functions pursuant to the law, the company bylaws, and its own regulations. (Source: Policy on Appointment, Succession and Compensation of the Board of Directors).
- 9. Contractors:** Individuals or legal entities with which GEB enters into a contract or service order for the provision of services to GEB. (Source: GEB's Code of Ethics and Conduct for Suppliers and Contractors).
- 10. Stakeholders:** Individuals or legal entities with which GEB has or seeks to have a work, legal, commercial and/or business relationship during the development of its corporate purpose. Including but not limited to: (i) Shareholders; (ii) Employees; (iii) Providers; (iv) Contractors; (v) Public Officials. (Source: GEB's Code of Ethics and Conduct)
- 11. Corruption:** Corruption involves the abuse of positions of power or trust, for personal gain at the expense of the collective interest, carried out through offering or requesting, delivering or receiving money or goods in kind, services or benefits, in exchange for actions, decisions or omissions (Source: Transparencia por Colombia)
- 12. Corporate Ethics and Compliance Committee:** The purpose of this collegiate management body of GEB is to strengthen ethical conduct at GEB, as well as implement coordinated actions against events and behaviors that run counter to the provisions of this Manual, the Code of Ethics and Conduct, the Manual for the Prevention of ML/TF/FPWMD, the corporate policies, the law and ethics (Source: Presidential Decision 018/2018, which regulates the Ethics and Compliance Committee).
- 13. Due Diligence:** Due diligence consists of performing the necessary actions to adequately get to know the Counterparties and/or business partners with which Grupo Energía Bogotá maintains commercial relations, reinforcing the knowledge of counterparties that, due to their activity or condition, are sensitive to money laundering, terrorist financing or financing the proliferation of weapons of mass destruction, and, in general, complying with each and every one of the obligations established in the Law and this Manual, the Code of Ethics and Conduct and provisions issued by Grupo Energía Bogotá.
- 14. Risk Factors:** Possible elements or causes generating the Risk of Corruption, Bribery and/or Transnational Bribery. Source: Corporate Transparency and Ethics Program Guide (PTEE). Source: Guide to the Corporate Transparency and Ethics Program (PTEE), Law 2195 of 2022 "by which measures are adopted regarding transparency, prevention, and fight against corruption and other provisions are enacted."
- 15. FCPA:** Foreign Corrupt Practices Act of the United States ("Foreign Corrupt Practices Act"). (Source: FCPA)
- 16. GEB:** It refers to Grupo Energía Bogotá S.A. E.S.P., its affiliates, and subsidiaries. (Source: <https://www.grupoenergiabogota.com/conoce-geb>)

- 17. Stakeholders:** Refers to individual or legal entities interested in and/or affected by GEB's business activities. Including but not limited to: (i) Counterparties; (ii) communities; (iii) markets. (Source: Corporate Governance Policy).
- 18. Sanctions Lists:** They are the lists of individuals and entities associated with terrorist organizations that are binding for Colombia under Colombian legislation and in accordance with international law, including but not limited to Resolutions 1267/1999, 1373/2001, 1718 and 1737/2006, 1988 and 1989/2011, and 2178/2014 of the United Nations Security Council, and all subsequent, related, and complementary lists, and any other list binding for Colombia (such as the terrorist lists of the United States of America, the European Union list of Terrorist Organizations, and the European Union list of Persons Designated as Terrorists).
- 19. Manual:** It refers to this Corporate Ethics, Anti-corruption, and Anti-bribery Manual. (Source: Corporate Ethics, Anti-corruption, and Anti-bribery Manual).
- 20. Compliance Monitoring:** A follow-up process on the decision and actions of risk management to ascertain whether or not exposure and risk were reduced. (Source: Compliance Department)
- 21. Compliance Officer:** The individual designated by GEB to lead and manage the Corporate Transparency and Ethics Program, and the Anti-corruption and Anti-bribery Management System, which is autonomous in its leadership and management. As defined by GEB, the Compliance Officer also leads the management of the risks of money laundering, terrorism financing, and financing the proliferation of weapons of mass destruction, personal data protection, conflicts of interest, and the prevention of violations to the competition regime. (Source: Circular Letter 100-000016/2020 from the Companies Superintendence.)
- 22. Facilitation Payments:** The term given to an illegal or unofficial payment made in exchange for services that the payer is legally authorized to receive without making such payment. It is usually a relatively small payment made to a public official or a person with a certification function in order to ensure or expedite the progress of a procedure or necessary action, such as issuing a visa, work permit, customs clearance, or phone installation. * It is clarified that such payments are expressly prohibited. (Source: ISO 37001:2016 International Standard - Anti-bribery Management System)
- 23. PEP:** Politically exposed persons, that is, individuals who perform public functions under any nomenclature and job classification system of the national and/or regional public administration that, by virtue of their position, ; issue rules, regulations, or institutional policies; administer justice or have sanctioning powers; have the function of general management and/or directly manage or administer public goods, money, or securities. This definition also includes senior executives of government entities, high-ranking officials of political parties, the judicial and legislative branches, heads of state and others who have held this position for two (2) or more years after leaving, resigning, or being dismissed from the position and/or those established in the regulations governing the matter. PEPs also include individuals who have a marital, de facto, or legal relationship with publicly exposed persons, as well as their relatives up to the second degree of consanguinity, second of affinity, and first civil. (Source: Decree 830/2021)

- 24. PTEE (Program of Transparency and Corporate Ethics):** It is a set of documents, policies, procedures, among others, that seeks to address situations related to Bribery and Transnational Corruption, to identify, detect, prevent, manage, and mitigate actions that put companies at risk. (Source: Compliance Department)
- 25. Suppliers:** Individual or legal entities with which GEB intends to have a legal, commercial and/or business relationship for the provision of services and/or goods and/or products to GEB. (Source: GEB's Code of Ethics and Conduct for Suppliers and Contractors)
- 26. Inherent Risk:** The level of GEB's inherent risk of Corruption and/or Bribery, without taking into account the effect of the designed and implemented internal controls. (Source: GEB's Comprehensive Risk Management Model)
- 27. Residual Risk:** The risk of Corruption and/or Bribery of GEB that remains after implementing the corresponding controls aimed at minimizing its impact or frequency. (Source: GEB's Comprehensive Risk Management Model)
- 28. Public Official:** Any person holding a legislative, administrative or judicial position in a State, its political subdivisions or local authorities, or in a foreign jurisdiction, regardless of whether the individual was appointed or elected, including, but not limited to: (i) any government official or employee of any state entity, department, agency or government institution; (ii) any person with an official capacity or who acts on behalf of a government, department, municipality, agency or government institution and/or state institution; (iii) any officer or employee of a corporation that is entirely or partially owned by the State; (iv) any employee of a public international organization; (v) any officer or employee of a political party acting in an official capacity on behalf of a political party; and, (vi) any candidate to public office. (Source: Law 1778/2016)
- 29. Bribery:** Any offer, promise, delivery, acceptance, or request of an improper advantage of any value (which may be financial or non-financial in nature), directly or indirectly, and regardless of the location thereof, in violation of applicable law, as an inducement or reward for a person to act or refrain from acting in connection with the performance of that person's duties. Bribery can take different forms; incentives can consist of gifts, hospitality, loans, commissions, rewards, or other benefits (services, donations, etc.). Bribery can occur in the relationship between one or more individuals or with a public official, or solely among private individuals. (Source: ISO 37001:2016 International Standard - Anti-bribery Management System).
- 30. Transnational Bribery:** A conduct consisting of giving, offering, or promising a foreign public official, directly or indirectly: (i) sums of money; (ii) objects of pecuniary value; and/or (iii) any benefit or advantage, in exchange for that foreign Public Official performing, omitting, or delaying any act related to his or her functions and in connection with an international business or transaction. (Source: Article 30 of Law 1778).
- 31. Business Partners:** According to the risk identification exercise and the expectations of external stakeholders' needs, it refers to the Board members, shareholders, suppliers, and contractors, with whom the company is related and who may represent more than a low risk of bribery. According to ISO37001, bribery risks related to business partners must be assessed and managed,

ensuring that their practices are transparent and ethical; this includes conducting due diligence and implementing controls to mitigate the risk of bribery.

32. Warning Signs: A set of qualitative and quantitative indicators that allow identifying the possible existence of a fact or situation beyond what GEB considers normal in the course of its ordinary activities, and that, in turn, contributes to building solid and relevant criteria that serve as a starting point for an efficient investigation and judgment of possible cases of Corruption and/or Bribery. (Source: GEB's SIPLA Manual)

DOCUMENT CONTROL

Version No.	Version date	Reason for update
1	April 11, 2023	CUM-MAN-005 Corporate Ethics, Anti-corruption, and Anti-bribery Manual is created in order to establish guidelines to ensure fulfillment of the commitments and the ethics culture of GEB, based on zero tolerance for acts of Corruption and Bribery.
2	October 31, 2024	Update in the framework of the implementation process of the ISO37001 technical standard

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